

5.0 OTHER MANDATORY SECTIONS

5.1 Cumulative Impacts

Cumulative effects are effects on the environment which result from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). Cumulative impacts from Indian gaming can include the development of other facilities in the project area by tribes or other individuals; the impact of additional gaming revenues on tribal and local economies; associated growth in the project area; and the impact on resources and services resulting from the development of gaming and other reasonable foreseeable development (see NIGC's Draft NEPA Manual).

Although it is anticipated that some additional economic development by the Pauma Tribe or by other non-tribal land owners in the project vicinity will occur in the future as a result of gaming, there are no specific projects that are foreseeable at this time. Additional growth on the Pauma Reservation will occur as individual projects are approved by the Tribal Council. Growth adjacent to the Reservation is subject to review by the County of San Diego for conformance to the General Plan, habitat conservation plans, and other land use policies and regulations. Future growth within the vicinity of the Pauma Reservation would result in a change in the character of the Pauma Community from rural development and agriculture to land uses that are more intensive and suburban in character. While this anticipated change in character may be substantial over the next 20 years, it is not considered significant because of the adopted land use controls.

Future cumulative effects were derived from recent, current, or known proposed projects in the area. These include the Prominence at Pala, Shadow Run Ranch, Pala Casino and Spa, Harrah's Rincon Casino, La Jolla Casino and Hotel, Santa Ysabel Casino, Warner Ranch, Palomar Aggregates, Gregory Canyon Landfill, Lake Rancho Viejo; the Passerelle, Pappas, and Pardee mixed use developments, which includes a Palomar College Campus; the SR-76 Corridor Study; Sycamore Ranch; and the Brook Hills residential project. Figure 33 shows the location of each of these projects in relation to the Pauma Reservation.

The following paragraphs discuss the assessment of potential cumulative impacts for each environmental topic. The intent of the cumulative impact analysis is to identify project impacts that may not be significant on a project level, but that could combine with other projects to be cumulatively significant. Based on the following review, the Proposed Project would not result in significant cumulative impacts to aesthetics, agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology/water resources, land use, mineral resources, noise, population and housing, recreation, socioeconomics and environmental justice, or utilities and service systems. The project's contribution to potentially significant cumulative impacts for air quality, public services, and transportation/traffic have been addressed in Section 4.0 at the project level insofar as where they were determined to be significant. In addition, where potentially adverse project impacts

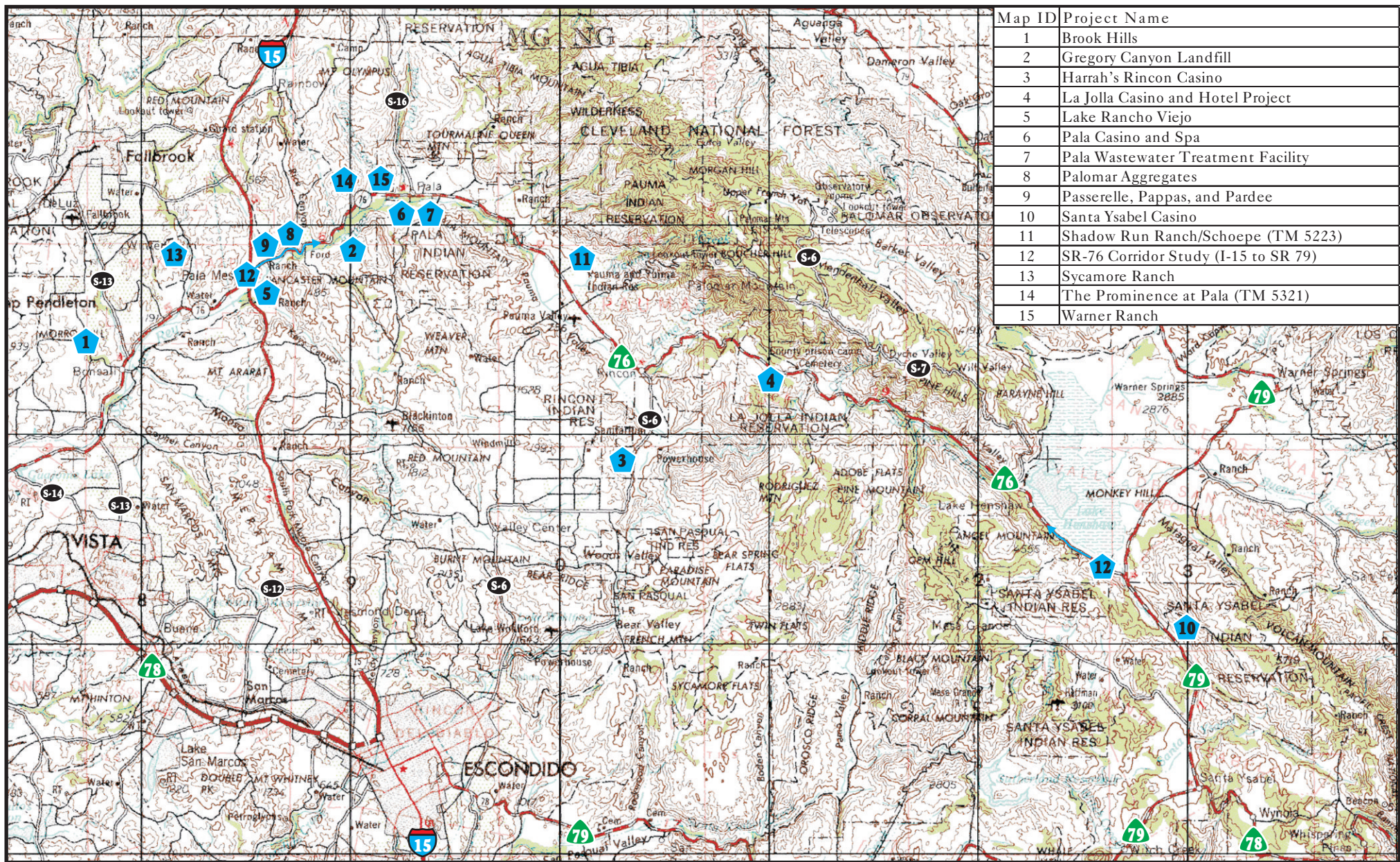
have been identified, mitigation measures have been incorporated into the project design and operations to reduce the impacts to less than significant. The project's contribution to cumulative impacts is discussed below for each of the issues that would result in direct or indirect impacts.

Cumulative Impacts – Project List

The Tribe has identified the following projects through a review of the most-recent (as of March 26, 2007) Pala-Pauma Discretionary Project Map (dated January 2006), comments provided in response to the Notice of Preparation, comments provided to the Pala Band of Mission Indians regarding the proposed expansion of the Pala Casino and Spa, and general knowledge of the Pauma Valley. Environmental files have been reviewed at the County of San Diego, Department of Planning and Land Use, Project Processing Counter if available. Several projects that were either denied or withdrawn were reviewed, but are not discussed in this document. The following paragraphs summarize each of the projects identified that could potentially contribute to environmental impacts along the SR-76 corridor, between Cole Grade Road and I-15. Environmental documents were reviewed, when available. However, environmental documents were not available for the majority of the projects, in most cases because draft reports had not been accepted by the County of San Diego as complete and were therefore not entered into the public record.

The Prominence at Pala (TM 5321) – The Prominence at Pala is a proposed 37-lot residential subdivision on 410 acres located west of the Pala Indian Reservation and north of SR-76. The County of San Diego identified biological resources, agricultural resources, steep slopes, dark skies, and traffic as potentially significant environmental impacts that must be addressed and have required the preparation of an Environmental Impact Report. No evidence that an Environmental Impact Report has been prepared to date was found in the project file. A request dated June 28, 2006 for a time extension to prepare the necessary environmental studies was the most recent documentation found in the project file. The current status of the project is unknown.

Shadow Run Ranch/Schoepe (TM 5223) – The Shadow Run Ranch project is a proposed 56-lot subdivision with 54 residential lots and 2 open space lots on 248 acres. Project access is from two points on Adams Drive. Most of the property is currently in agricultural groves. Minimum lot sizes are 2 acres. The most recent project description indicated a reduced project description with 47 residential lots and 3 open space lots. The County has required the preparation of an Environmental Impact Report. Issues to be addressed include traffic and accident rates on SR-76, project access, bicycle lanes, riding and hiking trails, dark skies, cultural resources, public services, agriculture, and groundwater. References to a draft Environmental Impact Report and a draft Traffic Report were found in the project file but copies of these draft reports are not available to the public because they have not been accepted as complete or accurate by the County.



Source: Base Map USGS 1:250k Quadrangle (Santa Ana)

Figure 33
Cumulative Projects Map



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Pala Casino and Spa – The Pala Band of Mission Indians has proposed the expansion of their existing casino and spa. The existing Pala Casino and Hotel facility consists of an 181,692 square foot casino and a 12-story, 507-room hotel on a 24-acre site located on the Pala Indian Reservation on the south side of State Route 76 (SR-76). The casino expansion will increase the interior square footage of the main level from 181,692 square feet to approximately 250,000 square feet. The Tribe also anticipates increasing the casino's number of slot machines from 2,274 to 2,524, and placing the 250 new slots in the expanded area. The spa will also be expanded. There will be 6-7 new treatment rooms added to the spa along with increased locker room spaces, increased lounge spaces and a private outdoor pool area.

A total of 2,683 parking spaces currently exist at the casino hotel parking structures and the surface valet, staff, and west lots. The proposed expansion project will include the construction of approximately 1,930 additional parking spaces. Most of the new spaces will result from new parking structures.

Approximately 30,000 square feet of additional administrative space and 20,000 square feet of additional administration/storage space will be added west of the existing administrative space and approximately another 10,000 square feet of administration/storage space will be added on two levels to the east of the current administrative space.

The Pala Tribe is considering road improvements to SR-76 at the western end of the Project Site, including the signalization of an intersection between the western parking garage and lot with SR-76. The proposed intersection improvements would improve traffic safety entering and leaving the Project Site and will facilitate access to the expanded parking structure. All improvements within the SR-76 right-of-way require Encroachment Permits from Caltrans. The Pala Tribe is currently working with Caltrans to develop appropriate improvement plans.

Pala Wastewater Treatment Facility - The Pala Band of Mission Indians is currently planning the construction of a new wastewater treatment facility adjacent to their existing wastewater treatment facility on the Pala Reservation. The project is designed to handle projected increased wastewater flows from the Reservation and to improve treated water quality to Title 22 standards for beneficial reuse.

Harrah's Rincon Casino – Harrah's Casinos partnered with the Rincon Band of Mission Indians to open the Harrah's Rincon Casino in August 2002 and added a 21-story hotel tower in December 2004. Harrah's Rincon Casino currently features 180,000 square feet of casino and hotel resort floor area that includes 1,600 slot machines, 100 bingo machines, 50 table games, an 848-seat entertainment pavilion, 8 restaurants, a spa, swimming pool, and a 21-story hotel tower with 653 rooms. No plans for additional expansion of Harrah's Rincon Casino are known at this time.

La Jolla Casino and Hotel Project – The La Jolla Band of Mission Indians have proposed the construction of a casino with 35,000 square feet of gaming area housing 500 slot machines and a 5,000 square-foot restaurant, an associated 150-room hotel, a 600-space surface parking area, on-Reservation improvements to SR-76, a new 250,000 gallon water tank and connections to

existing water lines, and a new wastewater treatment plant. Construction of the gaming facility is expected to take up to one year for the casino followed by an additional year to construct the hotel. The Tribe anticipates construction activity occurring 24 hours a day and seven days a week. Project grading and site preparation would include 50,000 cubic yards of balanced cut and fill plus 16,000 cubic yards of imported fill. The existing slope immediately south of SR-76 and west of the driveway would be lowered several feet to create a level pad for development of the casino and hotel buildings. The excavated material would be used for fill in the parking area. The Tribe circulated a Draft TEIR for public review in December 2005/January 2006. Construction has not yet commenced, and indeed the future development of the project is currently speculative.

Santa Ysabel Casino – The Santa Ysabel Band of Mission Indians recently opened their 78,000 square-foot casino high on a ridge east of SR-79 on the Santa Ysabel Indian Reservation, north of Santa Ysabel and south of Lake Henshaw. Improvements to the casino driveway intersection with SR-79 are currently under construction. No significant traffic impacts were identified.

Warner Ranch – The Warner Ranch project is located on the north side of SR-76, just west of the Pala Casino. No environmental documents are available from the County of San Diego regarding this project. An application to initiate a General Plan Amendment was submitted to the County July 13, 2005 and has been approved. A pre-scoping meeting was held between the applicant and the County August 2, 2006. A scoping letter had not been issued as of March 27, 2007 and no environmental documents had been prepared. The following information was contained in the project file. The information contained within the TEIR regarding this project is all that the Tribe has been able to obtain. This available information indicates that the project consists of approximately 900 dwelling units on 513.61 acres. The dwelling units range from multi-family condominiums to estate lots. The project also includes a 5.41-acre commercial area and a fire station. Water and wastewater services would be provided by the San Luis Rey Municipal Water District. More than half of the property would be protected as open space and would be an important component of the County's Multiple Species Conservation Program (MSCP). The timeline for project approval and development is not known. Whether this project will occur is speculative.

Palomar Aggregates – The Palomar Aggregates is located north of SR-76, between the Project Site and I-15. The 96-acre site was proposed for use as a quarry over 20 years ago. The County of San Diego initially approved a permit for the project in March 1997. The approval was successfully challenged in court based on inadequate analysis of air quality impacts. Following an additional environmental review period, the County of San Diego voted again in 2002 to approve the project. The project is now owned by Granite Construction, which hopes to mine 22 million tons of stone from 36 acres. A mitigation requirement is that SR-76 be widened from two lanes to four lanes between I-15 and the Palomar Aggregates Project Site, a distance of approximately 2 miles. Granite Construction is working with Caltrans on the plans for the improvements to SR-76 and has applied to the U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Game for the necessary approvals. Construction of the road improvements may commence

within the next year with the start of quarry operations to follow. The cumulative impacts of the Palomar Aggregates project were considered in the TEIR.

Gregory Canyon Landfill – The Gregory Canyon Landfill, first proposed over 18 years ago, is currently proposed on 1,770 acres south of SR-76 and the San Luis Rey River, approximately 3 miles east of I-15 and 2 miles west of the Pala Casino. The County of San Diego Department of Environmental Health (DEH) approved the project in February 2003, but the Environmental Impact Report (EIR) for the project was immediately challenged in Superior Court. The DEH circulated a Revised EIR for public review in 2006. According to the DEH “There is no time certain when this process will be completed.” There are other permits that must be obtained following approval of the project by DEH, if the DEH approves the project. The opening of the landfill is far from certain.

Lake Rancho Viejo – The Lake Rancho Viejo project has been under construction for over 20 years. Primary access to Lake Rancho Viejo is via Dulin Road from Old Highway 395, south of SR-76 and west of I-15. The property has been graded for many years, although the construction of homes continues. Nearly all traffic to and from Lake Rancho Viejo uses Old Highway 395. The other access point for the community is via Shearer Crossing through the San Luis Rey River.

Passerelle, Pappas, and Pardee – These three developers have proposed approximately 2,500 homes, a shopping center, town center with neighborhood-serving stores, office buildings, industrial space, and an 80-acre Palomar College campus at the northeast corner of the I-15/SR-76 interchange. Access would be from SR-76 and from Old Highway 395 via an existing I-15 overpass. The Fallbrook Community Planning Group is on record as supporting a maximum of 1,400 homes at this location. Environmental documents have not yet been released for public review.

SR-76 Corridor Study – The Reservation Transportation Authority, SANDAG, and Caltrans have been studying the need for improvements to the SR-76 corridor, east of I-15, for several years. Improvements to SR-76 have been made conditions of approval for several large projects along the SR-76 corridor, such as Palomar Aggregates and Gregory Canyon Landfill. The Pala Band of Mission Indians has also offered fair-share contribution towards improvements to SR-76. The SR-76 Corridor Study was completed in March 2007. The timing of improvements to SR-76 is unknown.

Sycamore Ranch – The Sycamore Ranch project consists of approximately 300 homes and a golf course on 485 acres on the west side of Gird Road, north of SR-76, approximately 2 miles west of I-15. This project is beyond a reasonable distance from the Project Site for the consideration of cumulative impacts.

Brook Hills – Brook Hills is located west of Sycamore Ranch, in the San Luis Rey Heights area. This gated community features minimum 2-acre lots. The real estate listings note the superior location with respect to traffic, density, noise, and pollution. This community is located north of

SR-76 and more than 3 miles west of I-15. This project is beyond a reasonable distance from the Project Site for the consideration of cumulative impacts.

5.1.1 Aesthetics

The Proposed Project will contribute to the man-made environment within the Pauma Valley and along the SR-76 corridor. As can be seen on the map of cumulative projects (Figure 33), there is a wide variety of development projects proposed along the SR-76 corridor, including residential, commercial, industrial, and Indian casinos. Each project must be considered individually to determine how it will best fit with the surrounding natural environment. The cumulative effect of this wide variety of developments is the gradual increase in more urban-type structures within what was originally a natural valley that has, in more recent history, evolved into a primarily agricultural and rural residential valley. The Proposed Project contributes to the ongoing changes to the visual landscape of the Pauma Valley, but less so than when it initially included a hotel tower of 23 stories. The Proposed Project is designed to have an attractive appearance, reflecting the colors of the surrounding landscape and sky, and the Tribe has entered into a MOU with Palomar Observatory to limit night lighting. The cumulative impact of the Proposed Project on aesthetics is not considered significant. The cumulative aesthetic impacts of alternatives – lower hotel heights, at 13 stories or 10 stories – would be substantially similar to those of the Proposed Project, yet more costly.

5.1.2 Agricultural Resources

The Proposed Project will contribute to the cumulative loss of agricultural lands in the Pauma Valley through the conversion of approximately 32.3 acres of citrus groves to land used for the commercial operation of the proposed casino and hotel. Few of the other projects proposed along the SR-76 corridor would result in the conversion of agricultural lands to development. In addition, the Tribe has purchased agricultural lands adjacent to the Reservation that it intends to keep farming. All impacts to agricultural resources would be on the Reservation within an area designated by the Tribe for agriculture and/or commercial development such as a casino and hotel. Therefore, this impact is not considered significant.

5.1.3 Air Quality

All of the cumulative projects will result in impacts to air quality for construction and operation. Upon completion, the air quality impacts of residential projects are primarily limited to the emissions from motor vehicles traveling to and from the residences. Other projects, such as quarries and landfills, result in diesel emissions from heavy equipment and trucks over the life of the projects. Commercial projects, such as casinos and hotels, generate large numbers of motor vehicle trips over the life of the projects. The air quality impacts of any one project, taken individually, would not be likely to have an adverse effect on the air quality within an entire air basin. In addition, air quality within the San Diego Air Basin can be adversely impacted by air pollution from the Los Angeles Air Basin during mild Santa Ana winds. The analysis of air quality impacts takes into account the cumulative nature of air quality impacts and the thresholds for determining significance reflect this. Therefore, if a proposed project is shown to result in air

quality impacts that are less than the established thresholds, the cumulative contribution of that project to air quality impacts is also considered to be less than significant. Therefore, while the Proposed Project would contribute to air quality impacts in the San Diego Air Basin, those impacts would be less than significant with the adoption of the mitigation measures listed elsewhere in this TEIR.

5.1.4 Biological Resources

Many of the cumulative projects considered would result in significant impacts to biological resources. The Proposed Project would be limited to areas of existing development and citrus groves. These areas do not support sensitive plant or animal species and all are located on the Reservation. Therefore, the Proposed Project would not contribute to the cumulative loss of sensitive habitats, plant, or animal species in the project area.

5.1.5 Cultural Resources

The Proposed Project would not result in any impacts to cultural resources. Therefore, it could not contribute to cumulative impacts to cultural resources.

5.1.6 Geology and Soils

Geology and soils impacts are by nature a site-specific issue. A geotechnical evaluation of the Project Site has been prepared and recommendations for building foundations, drainage, and erosion control have been made. It would be difficult for a project to contribute to a cumulative geology and soils impact unless perhaps a project were to be added to other projects in the vicinity of a known geologic hazard, such as an ancient landslide. There are no such cumulative projects or geologic hazards in the project area.

5.1.7 Hazards and Hazardous Materials

There are no known hazardous materials on the Project Site. The Proposed Project does not involve the manufacture, transport, or bulk storage of hazardous materials. The only hazardous materials that would be on the Project Site are those commonly associated with the construction, maintenance, and cleaning of commercial buildings. These materials would be stored and used in accordance with the manufacturer's recommendations and all applicable federal regulations. This potential cumulative impact would not be significant.

5.1.8 Hydrology and Water Quality

The Proposed Project is located adjacent to Pauma Creek, a short distance upstream of the San Luis Rey River. All of the cumulative projects are located within the watershed of the San Luis Rey River and all could therefore contribute to water quality impacts in the river. Each project must individually show that the rate of runoff would not be increased and that the quality of runoff would not be degraded. This can be accomplished through the use of natural drainage swales, landscaping, detention basins, and in the case of extensive paved areas, inlet traps and

filters for trash and hydrocarbons. Potential hydrology and water quality impacts have been identified for the Proposed Project and the Proposed Project would include site-specific measures to control the quantity and quality of storm water runoff. This would prevent the cumulative contribution of the Proposed Project to hydrology and water quality impacts from being significant.

5.1.9 Land Use and Planning

The Proposed Project would combine with other on-Reservation and off-Reservation projects to convert agricultural lands to developed uses. All off-Reservation development is regulated by the County of San Diego and must be in compliance with the County's General Plan and Zoning Ordinance. Each project is typically subjected to years of planning and environmental review prior to approval or denial. Some projects, such as Palomar Aggregates, have been in planning and environmental review stage for over 20 years. Development on each of the Indian Reservations in the project area is subject to approval by the individual tribes. The Proposed Project will replace an existing casino with a much larger casino and hotel complex, similar in scale to those found on the Pala and Rincon Reservations. While this type and scale of development was not envisioned by the County of San Diego with respect to its land use designations for the areas surrounding the Reservations, the County lacks land use jurisdiction over the Reservations, and the individual Tribes have their own governmental authority, confirmed by the Supreme Court and Congress, to engage in gaming on their lands. Since Tribes have the prerogative to develop Reservation gaming facilities under the terms of their own land use plans and regulatory restrictions, without the constraints of local land use plans, the Tribe's Proposed Project does not impact local land use plans or vice versa. Thus, this impact would not be significant.

5.1.10 Mineral Resources

Most of the mineral resources within the Pauma Valley are contained within the floodplain of the San Luis Rey River. This area was once a major source of sand and gravel for construction. Mining of this mineral resource has been virtually stopped in the past 10 years due to environmental concerns. One of the cumulative projects, Palomar Aggregates, proposes the mining of a mountain adjacent to the San Luis Rey River. This project has been held up in the planning and environmental review process for over 20 years and it is not known if or when mining will begin. None of the other projects are known to be located on an economically-viable mineral resource. The material beneath the Pauma Reservation is not a viable source of sand or aggregate and approval of the Proposed Project would not contribute to the loss of a mineral resource. This potential impact would not be significant.

5.1.11 Noise

The construction of each of the cumulative projects would result in construction noise. Following construction, most noise impacts for residential projects would be associated by project-generated traffic. Commercial and industrial operations, such as Palomar Aggregates Quarry and the Gregory Canyon Landfill, would result in noise impacts from the continued use

of heavy equipment and trucks. Due to the nature of noise impacts, the area where cumulative impacts are possible is much smaller than for another type of potential impact, such as air quality or biological resources. None of the cumulative projects are close enough to the Pauma Reservation to result in cumulative construction noise impacts.

Operation of the Proposed Project would increase traffic volumes on SR-76, which would in turn increase the noise generated by traffic on SR-76. The project traffic report includes segment traffic volumes for existing, near-term, and horizon year scenarios. Comparison of the horizon year plus project volumes to the existing volumes indicated the greatest volume increases and therefore the greatest noise increases. The segment of SR 76 with the greatest forecast increase is east of Valley Center Road. The traffic volume would triple, indicating a noise increase of approximately 4 dBA. This may be an overestimate because the level of service would degrade from B to E, indicating reduced speeds and a lesser noise increase. The project would contribute 97 vehicles per day to an increase of over 8,000 vehicles per day. The project contribution would not be substantial. Between Pala Mission Road and I-15, the with-project traffic volumes in 2030 would be a little more than double the existing volumes, and the project would contribute just under 20 percent of the increase. The noise levels would increase approximately 3 dBA. This increase would be less than the County noise significance guideline of 10 dBA. Therefore, the cumulative noise impact would be less than significant.

5.1.12 Population and Housing

None of the cumulative projects would result in the substantial loss of housing or would displace a large portion of the local population. The Proposed Project, together with developments at the nearby Pala Casino and Spa, would not cause any significant impact on population or housing in the project area (Rea & Parker Research, 2007). Other proposed projects may increase the housing available in the project area, and increase the local population. The Proposed Project would not add to that change and would not result in the loss of any housing or the displacement of any persons. Therefore, this impact would not be significant.

5.1.13 Public Services

Each of the cumulative projects considered would increase the demand for public services, such as law enforcement, fire, and emergency medical response. This is because most of the projects would convert natural or agricultural areas to developed areas and would attract persons to the area. Several Reservations, such as San Pasqual, Rincon, and Pala, have constructed new fire stations to handle the increased demand for fire protection services and the unique need to protect highrise structures on their Reservations. The Pauma Tribe is currently planning the expansion of their fire station on the Pauma Reservation and has mutual-aid agreements in place with the Pala and Rincon Tribes. The Valley Center/Pauma Sheriff's Substation provides law enforcement services within the project area. The Pala and Rincon Tribes have contracted directly with the County for additional law enforcement services through the provision of Tribal Deputies. The San Pasqual and La Jolla Tribes have also contracted for additional law enforcement services for special events. The Pauma Tribe would also contract with the Sheriff's Department for additional law enforcement services for the Proposed Project. The Pauma Tribe

would also contract with the California Highway Patrol for services to SR-76 and I-15. This cumulative impact would be adverse without the agreements for law enforcement, fire, and emergency services between the County of San Diego Sheriff's Department and neighboring Tribal Governments. Those intergovernmental agreements reduce this impact to less than significant.

5.1.14 Recreation

The cumulative residential projects will increase the demand for recreation in the project area, while the commercial and industrial projects will not. The larger residential projects, such as are proposed at the I-15/SR-76 interchange, include neighborhood schools and parks. The Proposed Project would provide a destination resort that would include many opportunities for recreation. Project guests are not expected to increase the demand on existing parks or other recreation facilities in the project area. This potential cumulative impact would be less than significant.

5.1.15 Socioeconomics and Environmental Justice

No cumulative socioeconomic or environmental justice issues have been identified.

5.1.16 Transportation/Traffic

The Proposed Project would contribute to significant traffic impacts on SR-76. Traffic impacts on SR-76 are already known to be significant by SANDAG, Caltrans, and the Reservations that use SR-76 for primary access. The Reservation Transportation Authority has been given the task of completing a corridor study for SR-76 that will identify a comprehensive road improvement program benefiting all projects and motorists that rely on this route. This impact is significant and requires mitigation. Mitigation measures have been proposed for the Proposed Project, including the signalization of the SR-76/Pauma Reservation Road intersection and a fair-share contribution to other SR-76 improvement projects.

5.1.17 Utilities and Service Systems

Each of the cumulative projects would increase the demand for utilities and service systems in the project area. All necessary utilities and service systems are available to the existing casino. Water and wastewater are provided on the Reservation. These systems would be improved as part of the Proposed Project. Off-Reservation services, such as electricity from SDG&E and solid waste disposal, would be provided in return for the payment of connection and service fees. Each project must mitigate for impacts to utilities and service systems on an individual basis. The Tribe would do this for the Proposed Project. Potential cumulative impacts would be less than significant.

5.2 Issues Determined to be Less Than Significant Through the Initial Study Process and Not Discussed in Detail in the TEIR

While an Initial Study checklist was prepared for the Proposed Project to help identify the scope of the environmental analysis, the Initial Study was not used to exclude any topics from further discussion within the EA/TEIR. As a result of analyses for preparation of the Final EA/TEIR, it has been found that the Proposed Project will result in potentially adverse impacts to aesthetics, air quality, biological resources, hazards and hazardous materials, noise, public services, and traffic/circulation. However, the incorporation of mitigation measures into the project design will maintain all impacts associated with these issues at levels less than significant. No significant adverse impacts will occur to agriculture, cultural resources, geology/soils, hydrology/water quality, land use, mineral resources, population and housing, recreation, socioeconomic conditions (environmental justice) of the Pauma Tribe, or utilities and public services.

5.3 Significant Effects on the Environment that Cannot be Avoided if the Project is Implemented

The Proposed Project will be constructed within the footprint of the existing casino, on the Pauma Reservation, with improvements to Pauma Reservation Road and SR-76 required as mitigation for potential traffic/circulation impacts. Off-Reservation impacts will be limited to aesthetics, traffic, visual resources, noise, public services, and air quality. Mitigation measures have been proposed to reduce below significance or avoid each of the identified impacts. There are no significant effects on the environment that cannot be avoided if the project is implemented because mitigation has been identified for all significant impacts that would reduce those impacts to below a level of significance.

5.4 Irreversible Effect on the Environment if the Project is Implemented

The Proposed Project will require the use of energy for construction, operations, and maintenance. Much of the energy that will be used will be from non-renewable sources, primarily fossil fuels. As noted above, impacts to off-Reservation visual resources, traffic, noise, and air quality will occur. The Tribe believes that the visual impacts of the project will be positive through the use of architecturally interesting and attractive colors, textures, and landscaping. Traffic, noise, and air quality impacts will depend upon improvements to SR-76 and improvements to motor vehicles. For example, increased use of electric, hydrogen fuel cell, and hybrid gas/electric and diesel/electric vehicles in the future would reduce noise and air quality impacts associated with project-generated trips. Therefore, the projects off-Reservation impacts are not considered to be irreversible.

Indirect Effects and Growth Inducement

Indirect effects are those that may be later in time or farther removed in distance from the Proposed Project, but are still reasonably foreseeable, including any growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth

rate, and related effects on air and water and other natural systems, including ecosystems. A project is considered to be growth inducing if it will directly or indirectly foster economic or population growth or the need for additional housing. Examples of growth inducing impacts are the extension of water, sewer, or other utilities to an area currently un-served or under served by the utility. A project could be considered to be growth inducing if it burdens existing community services or facilities to such an extent that new services or facilities will be necessary. A project that will encourage or facilitate additional development that causes significant environmental effects may be considered to be cumulatively growth inducing. Growth could occur in the form of commercial development, and land residential development, and/or increased numbers of concentrations of housing.

The Proposed Project and its construction will not cause any significant impacts through indirect effects or growth inducement. There will be no increase of population or need for housing in the area as a result of the Proposed Project (see Section 4.12 and Rea & Parker Research report in Appendix I). The increase direct and indirect employment from the Proposed Project is not likely to generate the development of ancillary services in the area because of the tendency of such growth to locate near residential locations, not places of employment (see Rea & Parker Research Report). Further, the influx of patrons visiting the Proposed Project is unlikely to generate any significant ancillary business development because of the powerful capture rate of casino resorts for food, beverage, and shopping activities (see Rea & Parker Research Report).

The Proposed Project would not extend water, sewer, or any other utility or service to an off-Reservation location, and would therefore not directly result in the growth of off-Reservation lands. The Proposed Project, however, would contribute to much needed improvements along SR-76 and would provide some additional employment opportunities for off-Reservation residents. The Proposed Project would not result in significant indirect effects or growth inducement.